ATTACHMENT 1

"SOUTHWESTERN BELL - EDI/LSR Ordering Exception Ordering Release Announcement for September 23, 2000"

Date: May 11, 2000

Number: **CLECSS00-073**

Contact: Southwestern Bell Account Manager

This Accessible Letter serves as the Release Announcement for EDI/LSR Ordering. The Release is currently targeted for September 23, 2000. Southwestern Bell seeks an exception to the Change Management Process to implement this release on an expedited basis. Due to the work on the mandated release for Line Sharing many of the enhancements originally planned for the July release have been delayed. Southwestern Bell is proposing to deliver these enhancements in this September release.

Southwestern Bell is planning enhancements in the following areas:
- Flow-Through
- Additional edit changes

Details will be provided in the Initial Requirements in a future Accessible Letter.

Following the Change Management Process, CLEC responses to this Release Announcement are due to your Account Manager by May 25, 2000. Please direct any questions to your Account Manager.

ATTACHMENT 2

From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
<mailto:[mailto:rb5422@txmail.sbc.com]>
Sent: Tuesday, May 09, 2000 1:11 PM
To: Willard, Walter W (Walt), NCAM
Cc: Chambers, Julie S, CMRGN; Deyoung, Sarah, NCAM; Hall, Lori L, CMRGN;
O'SULLIVAN, PAUL (PTSS)
Subject: RE: CLECSS00-051 - Address Validation

Walt:
I thought I responded to your e-mail but in checking I can't find that I did
so I apologize for that. Although these types of issues need to be worked
back through Change Management I have responded below to your questions.
Thanks,
Robert Bannecker
Account Manager - Industry Markets
Southwestern Bell Telephone Company
311 So. Akard, Rm. 630.08
Dallas, TX 75202
214-464-1053 - Office
214-858-0281 - Fax
888-961-8352 - Pager
rb5422@txmail.sbc.com <mailto:rb5422@txmail.sbc.com> - E-Mail

-----Original Message-----
From: Willard, Walter W (Walt), NCAM [mailto:wwillard@ems.att.com]
<mailto:[mailto:wwillard@ems.att.com]>
Sent: Wednesday, April 12, 2000 4:26 PM
To: BANNECKER, BOB G (SWBT)
Cc: Chambers, Julie S, NLSSS; Deyoung, Sarah, NCAM; Hall, Lori L, NLSSS;
O'SULLIVAN, PAUL (PTSS)
Subject: RE: CLECSS00-051 - Address Validation

Bob,
AT&T supports the concept of removing the service address requirement for
UNE conversion activity, but has some reservations based on the requirements
as published in SWBT's Accessible Letters CLECSS00-008,CLECSS00-040,
CLECSS00-051 and CLECSS00-058. First, AT&T is concerned that SWBT's
published requirements do not provide an option whereby a service address,
if submitted, would be checked against the submitted telephone number in
order to detect a potential customer mismatch. The method used by Pacific

1

Bell, whereby the service address that a CLEC submits is not used to process the service request, but is partially validated against the TN, provides a protection against unintentional slamming that is not provided in SWBT's proposed requirements. Is SWBT willing to consider adding the Pacific Bell partial validation process?

RESPONSE: Requests from CLECs have been not to require the address on conversion orders.

SWBT has responded to those requests with the 5-27-00 release which no longer requires the address to be populated on conversion orders. There will be no validation on these types of orders.

SWBT will only validate the end user address on orders with a LNA of N. In order to validate, via the Pacific Bell validation process, population of the end user address would be required and that is not something the CLECs have said they want to do.

Second, we need to understand what process SWBT will follow when its downstream systems discover that the address retrieved internally from the CSR and the address as it exists in PREMIS do not match. How often does SWBT expect this will occur? What will be the impact on provisioning and billing? Will the CLEC be aware of the problem?

RESPONSE: There is no historical data on this but we anticipate these situations to be rare. If it does occur SWBT will reconcile the correct address with any database which may contain incorrect data. If this situation should occur the impact (if any) on provisioning and billing will be minor.

Third, we need to ensure that there is an adequate opportunity for testing of this release to determine whether it is functioning properly. In connection with the joint testing of this release, can SWBT take the test orders all the way through to posting?

RESPONSE: The test environment does not allow taking an order all the way through to posting. This issue has been discussed in Change Management. Short of that, as we have previously discussed, thorough testing cannot be accomplished until SWBT implements this release in the production environment. In addition, because of the lack of standard lead time between the announcement of the release and its introduction, AT&T will have to conduct simulation testing because it will not have yet done the internal development work necessary to implement the release end-to-end.

In light of our concern that the elimination of the service address requirement not be delayed any further, AT&T withdraws its objection to the change, but requests that the issues raised in this e-mail be addressed expeditiously.

Thanks,

ATTACHMENT 3

Documents associated with this attachment are proprietary and are being provided under separate cover pursuant to the Protective Order.

ATTACHMENT 4

Jeopardy Description	December	January	February	March	April
Assignment Problems	2		5	15	13
Account Already Converted*		8	102	116	54
Account Not Eligible for Conversion*		3	23	31	25
Busy Cable & Channel Pair			1	2	
Customer Not Ready	1	2	2		3
Customer could not be rached at reach number			1	2	
Duplicate LSR*		2	20		20
Duplicate Circuit ID			1	17	
EU Not Ready	7	24	47	30	32
End User name and TN Do Not Match*		1	19	9	2
Field Visit Determined Address Invalid	10	18	51	148	230
Frame Due Time Could Not Be Met			3		
Invalid CFA			1		2
Invalid Due Date*		12	75	77	19
Invalid Feature		1	10	11	16
Invalid Feature Detail		2	8	8	6
Invalid TN*		22	140	64	60
No Access to EU Prem	7	12	23	11	12
No Loop Available			4		8
Need to obtain Right of Way				1	
Notification of New DD	19	31	24	22	46
NSP Missed Appt	1		14	36	93
Not Technically Feasible				4	2
Please Send SUPP to Cancel PON	9	11	13	14	5
Provide Driving Instructions			1	1	
Requested DD is Less than Published Interval*		12	37	9	5
Scheduling and Workload	1				
Special Construction			3		
The Prem is not Ready	3	2	1	3	2
There No Facilities	21	22		144	201
There is no Access	1		70	4	6
Verify address or Provide Nearby TN*		21	149	182	276
Entrance Facility Required					1
TOTAL	82	206	848	961	1139
* # of Jep's which are actually post FOC errors	0	81	565	488	461

ATTACHMENT 5

WORKSHOP - PROJECTS 20400/22165

TEXAS PUBLIC UTILITY COMMISSION

COMPRESSED TRANSCRIPT

TUESDAY, MAY 2, 2000

KENNEDY REPORTING SERVICE, INC.

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Page 3

1   MS. KLAMERT: Abigail Klamert and
2 Rina Hartline for Birch Telecom.
3   MS. NELSON: Okay. Now, let's
4 have the witnesses sitting at the table
5 introduce themselves starting with Southwestern
6 Bell.
7   MS. DILLARD: This is Maria
8 Dillard, Southwestern Bell.
9   MS. CULLEN: Angie Cullen,
10 Southwestern Bell.
11   MR. DYSART: Randy Dysart,
12 Southwestern Bell.
13   MR. NOLAND: Brian Noland,
14 Southwestern Bell.
15   MS. CHAMBERS: Julie Chambers,
16 AT&T.
17   MS. McCALL: Cindy McCall,
18 MCIWorldCom.
19   MS. EMCH: Marsha Emch,
20 MCIWorldCom.
21   MR. KAGELE: Tim Kagele, Time
22 Warner Telecom.
23   MR. SAUDER: T.J. Sauder, Birch
24 Telecom.
25   MS. NELSON: Okay. Is there

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1   PROCEEDINGS
2   TUESDAY, MAY 2, 2000
3   (9:40 a.m.)
4   MS. NELSON: Let's go on the
5 record in Project No. 20400, Section 271
6 Compliance Monitoring of Southwestern Bell
7 Telephone Company of Texas, Project No. 22165,
8 Implementation of Docket Nos. 20226 and 20272.
9   My name is Donna Nelson. I'm one of
10 the presiding officers. With me are Nara
11 Srinivasa and Jennifer Fagan. Let's start out
12 by having everybody make an appearance. Let's
13 start with the attorneys, and then we will have
14 the witnesses introduce themselves.
15   MS. MALONE: Cynthia Malone, Bob
16 Gryzmala and we will have Tom Horn for
17 Southwestern Bell.
18   MR. COWLISHAW: Pat Cowlishaw,
19 Kathleen LaValle and Michelle Bourianoff for
20 AT&T and TCG.
21   MR. WAKEFIELD: Good morning, Your
22 Honor. Jason Wakefield on behalf of
23 MCIWorldCom.
24   MS. MUDGE: Kathryn Mudge on
25 behalf of Rhythms Links.

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1 anyone else in the audience who intends to be a
2 witness?
3   MS. HALL: Lori Hall, AT&T.
4   MS. YEE: Grace Yee, AT&T.
5   MR. SIEGEL: Howard Siegel, IP
6 communications.
7   MS. MUDGE: Your Honor, on behalf
8 of Rhythms Links, Ann Lopez who was the subject
9 matter expert we had at the previous workshops
10 is unavailable due to a family emergency. She
11 will not be available today or tomorrow.
12   Therefore, I have been asked by Rhythms
13 to provide additional information with respect
14 to any proposal that we have.
15   MS. NELSON: Okay. Thanks.
16   MR. KITE: Jim Kite with Sprint.
17   MS. NELSON: Okay.
18   MR. KAGELE: Your Honor, before we
19 get started, Eric Drummond, outside counsel for
20 Time Warner and other CLECs I believe is with a
21 client now. I don't believe he has introduced
22 himself at the moment, but he will be here.
23   MS. NELSON: Okay. Thank you.
24 Today we will be working from the draft that we
25 discussed Friday in our conference call, and

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1 Birch Telecom. It is a different point but —
2   MS. NELSON: Let's let Mr. Dysart
3 respond then.
4   MR. DYSART: This is Randy Dysart,
5 Southwestern Bell. The purpose of this
6 exclusion is simply to allow the LSC enough time
7 to staff up to meet the demands of the CLECs
8 based upon -- based upon anything out of the
9 ordinary that the CLEC is going to do.
10   If the CLEC all of a sudden starts a
11 new marketing campaign and increases its volume
12 daily 100 percent, it takes time to be able to
13 provide enough resources to do that. And what
14 that does is adversely impact the performance
15 measurement results.
16   We are not asking that you give us
17 detailed marketing because the wholesale
18 organization is there to serve the CLEC, not to
19 market to our retail organization. We are not
20 asking you to provide it to our retail
21 organization. We are asking for the CLECs to
22 help the LSC be able to provide the type of
23 service they want us to provide by giving us a
24 heads-up if your strategy is changing so that we
25 can properly meet that demand for those things

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1 that manually fall out.
2   MR. SRINIVASA: Well, let me ask
3 you this: Whether it falls out manually or not,
4 it depends on how many edits you put out there
5 on the LSR. Right? It's under your control how
6 many are going to fall out? The more edits you
7 put into LASR, the less fall-outs you will have.
8 How would they know how many are going to fall
9 out?
10   MS. DILLARD: This is Maria
11 Dillard. Certainly the CLECS do have the
12 information on what types of services are MOG
13 eligible. So they would also know that if they
14 are sending a different type of product or a
15 different option on a service, that those
16 types -- that type of activity would be falling
17 out for manual handling.
18   So in that instance, I mean, that is
19 published information on what types of products
20 flow through.
21   MR. SRINIVASA: Well, the first
22 place the objective here is to maximize the
23 number of edits in the LASR, and you're asking
24 them to provide you the data on forecast, I
25 don't know how many months ahead, every day or

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1 every month -- we don't even know what this --
2 90 days in advance.
3   So are you saying that for those 90
4 days in advance, all of the edits are in freeze,
5 that you don't add any edits, nothing changes?
6   MR. DYSART: No. This is Randy
7 Dysart, Southwestern Bell. We are not talking
8 about freezing edits, absolutely not. You're
9 right. Our goal is to move as many edits up
10 into LASR as possible so that these things are
11 -- our errors are rejected back. But for
12 certain orders that aren't MOG eligible that
13 fall out, the LSC still has to handle those
14 manually.
15   MS. NELSON: Okay. You know, I
16 think staff is probably concerned with this
17 proposed change as well. So I'm not so sure
18 unless somebody has something to add in terms of
19 clarification that we really need all that much
20 more information on it. Ms. LaValle?
21   MS. LaVALLE: Just because they
22 are sort of companion pieces, AT&T has the same
23 very strong objection to what's in the business
24 rule for CLECs who choose to, they call it,
25 "batch their LSRs," that that would be included

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1 when the time stamp is taken so that basically
2 Southwestern Bell would determine at what point
3 the stop watch starts.
4   I would have very strong objections to
5 it in concept and, also even by definition, it
6 uses words like "rapid succession, special
7 arrangements will manage the process." All of
8 this is very, very imprecise, likely to give
9 rise to disputes. And I think what our response
10 to these issues would be that, first of all, we
11 have a problem with how they use the word
12 "batching."
13   Our understanding is that batching
14 doesn't mean just sending orders quickly.
15 Batching technically means actually condensing
16 multiple files into a single electronic
17 transaction. So even though the word choices
18 are not precise and do not fit the concept. So
19 we can spend -- we need to spend a lot of time
20 on this concept if the Commission is at all
21 interested in going down this path. I want to
22 just note our very, very strong objection to the
23 concept.
24   MR. KAGELE: Tim Kagele, Time
25 Warner. We will echo the comments from AT&T.

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1 proposed 10.2, which was percentage of orders
2 that receive a jeopardy notice. We spoke about
3 this a little bit at the last discussion.
4   JUDGE NELSON: Did we finish the
5 discussion?
6   MS. CHAMBERS: I don't think so,
7 but -- and I -- I have not heard whether
8 Southwestern Bell has even considered this since
9 the last date -- or since they've seen it.
10   JUDGE NELSON: Well, I think
11 they've given us -- the package they gave us
12 included all the things they were willing to
13 accept. So I'm assuming by the fact that it's
14 not in that, that they have not agreed to
15 include --
16   MS. MALONE: That's --
17   MS. LaVALLE: Is there a
18 counter-proposal?
19   MS. MALONE: Cindy Malone for
20 Southwestern Bell.
21   MS. LaVALLE: Cindy, is there a
22 counter-proposal?
23   MS. MALONE: No, not since our
24 filing.
25   MS. LaVALLE: Well, this is --

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1 there's also a companion measure, just so we're
2 talking about them together, 11.2, which is the
3 time to return a jeopardy. I was hoping we at
4 least had an agreement in principle that you
5 need a measure to capture jeopardies -- we need
6 a measure to capture jeopardies even before the
7 new issue in mid-January where late rejects have
8 to FOC after coming back as jeopardies. I was
9 hoping that would not be a matter of substantial
10 debate and we could get into the language, but
11 we've not seen any criticism of our measure --
12 nothing concrete for us to counter-respond to.
13   JUDGE NELSON: Mr. Dysart?
14   MR. DYSART: This is Randy Dysart.
15   JUDGE NELSON: Do you dispute that
16 jeopardy needs to be measured?
17   MR. DYSART: No. I think we're
18 willing to work on this. I think a couple of
19 areas of concern here is it includes all
20 jeopardies. And I think what the intent -- as I
21 viewed the intent of what we wanted to try to
22 capture here is those jeopardies that use to be
23 rejects after FOC. There are still jeopardies
24 that we send that are based on lack of
25 facilities. They will always be there. They

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1 always have been there. And I don't see that as
2 necessarily -- or that that should be
3 incorporated in this. If it's to measure those
4 rejects that people were concerned about that we
5 used to reject after FOC, then I think we're
6 willing to discuss this. If it's in all
7 jeopardies, then I think that's the biggest
8 point of contention that we have.
9   MS. LaVALLE: And there is -- this
10 is not a novel issue or a unique to Southwestern
11 Bell or otherwise issue. It's a standard
12 measure in this kind of environment that you
13 would report jeopardies. Our only unusual
14 aspect of it is that it also includes late
15 rejects, and for that reason, we proposed it be
16 reported on a disaggregated basis so that we
17 wouldn't have any disagreement, when the
18 jeopardy number went up, whether it went up
19 because you had a bunch of late rejects or
20 because they had a work crew problem or what the
21 particular issue was. This is, I think, a gap
22 in the structure. Like I said, we're hoping
23 that wouldn't be a threshold issue.
24   MR. KAGELE: This is Tim Kagele,
25 Time Warner. Time Warner will support our

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1 colleagues at AT&T. We had also proposed two
2 similar jeopardy measures. Time Warner's
3 proposed Measurement 1A, which is percentage of
4 orders given jeopardy notice -- and I will point
5 out that PacBell has agreed to this very measure
6 in California.
7   Time Warner has also proposed
8 Measurement 2A, percentage of orders given
9 jeopardy notices within 24 hours of the due
10 date, and it's a timeliness measure. Again, I
11 think that's in alignment with AT&T's remarks,
12 and PacBell has agreed to make that measure in
13 California as well.
14   MS. LaVALLE: And Ameritech has
15 been required to do that in Michigan as well.
16   JUDGE NELSON: Mr. Dysart, we
17 don't -- in Texas, we don't like to be behind
18 these other states.
19   (Laughter)
20   MR. DYSART: Does somebody have a
21 shovel so I can dig a hole?
22   (Laughter)
23   MR. DYSART: I guess my biggest
24 issue with this one is a jeopardy -- the
25 percentage of time we return a jeopardy on lack

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1 of facilities, we're doing it on lack of
2 facilities based on missed due dates. Now we're
3 wanting to initiate another measurement that
4 says I can only have so many jeopardies.
5 Well --
6   JUDGE NELSON: Can you go back
7 and --
8   MR. DYSART: Yeah. I would like
9 to.
10   JUDGE NELSON: -- look at what's
11 being done in California and Michigan --
12   MR. DYSART: We will do that.
13   JUDGE NELSON: -- and look at what
14 you can do and make sure there's no overlap with
15 other measures?   --
16   MR. DYSART: Most definitely we'll
17 take a look at this.   --
18   JUDGE NELSON: Okay. I think
19 we've really gone, from a time standpoint, as
20 far as we can go today. There's a couple of
21 things we need to discuss just in closing. One
22 is we have some future dates for some of the
23 sessions, which I'll also announce tomorrow
24 because some of them are DSL specific. And we
25 also have some extremely large homework

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1 assignments.
2   Okay. The first session that we have
3 scheduled, which really doesn't relate to PMs,
4 but -- is a DSL working group meeting, which is
5 scheduled for the 15th of May. And we'll
6 announce that at the DSL session tomorrow as
7 well. We're not scheduling any more DSL PM
8 sessions until we make an assessment at the end
9 of tomorrow as to whether or not they're needed.
10   The next session dealing with various
11 issues will take place on June 6th. That will
12 be completion of OSS measures, including where
13 we left off today, beginning with 10.2, 11, 12,
14 and 13. And then billing will also be covered
15 on the 6th, trunking and collocation.
16   On the 8th will be the remaining issues
17 that we have not so far discussed, which I have
18 down as wholesale support, which I think is --
19   JUDGE SRINIVASA: LSC and LOC?
20   JUDGE NELSON: Actually, 21
21 through 26. LNP and NXX, directory assistance
22 and OSS. 9.11 and BFRs -- none of those are
23 really -- have very many numbers -- and LIDB.
24 Just one moment.
25   (Brief pause)

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1   JUDGE NELSON: Okay. And then the
2 carryover session from yesterday on UNE and
3 UNE-P and resale will be on June 9th. And now
4 comes the homework assignments.
5   MR. KAGELE: Judge Nelson, could
6 you repeat the schedule on 6.9, please?
7   JUDGE NELSON: Sure. It's a
8 carryover from yesterday; UNE, UNE-P, and
9 resale. And it will be all -- it's still a lot
10 of measures. It's --
11   JUDGE SRINIVASA: Well, resale
12 specials and UNE combinations.
13   JUDGE NELSON: Right. Right.
14   MS. BOURIANOFF: Judge Nelson?
15   JUDGE NELSON: Yes.
16   MS. BOURIANOFF: Can I ask a
17 question about the schedule?
18   JUDGE NELSON: Yes.
19   MS. BOURIANOFF: AT&T proposed a
20 change of management measure. Would you suggest
21 that be addressed on the 6th or on the 8th?
22   JUDGE NELSON: I guess it could be
23 addressed on the 6th.
24   MS. BOURIANOFF: Okay.
25   JUDGE NELSON: And then the

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1 remainder -- like there are some general
2 overview measures that will be discussed on the
3 8th as well. Because everything that we haven't
4 done once will be -- to the extent I haven't
5 included it, it will be discussed on the 8th.
6   Now for these homework assignments. We
7 want all of you who are interested in
8 participating in future PM sessions to work
9 off-line once a week between now and the next
10 session, which is set for the 6th, to try to
11 come to agreement to the extent possible. At
12 least if you can't come to agreement on the PMs
13 themselves, at least come to us with an
14 agreement on what the factual situation is.
15   MR. DYSART: Southwestern Bell --
16 we're in total agreement.
17   JUDGE NELSON: Okay. So let's
18 start with next week.
19   MR. DYSART: Okay.
20   JUDGE NELSON: And I was
21 envisioning this could happen by conference
22 call. Okay. What day next week -- it would
23 seem like it would be better if you could do one
24 day a week the same day, but that may not be
25 possible. So I guess -- let's plan one day next

ATTACHMENT 6

CLEC Proposals 10.2

ATT

10.2   Percentage of Orders That Receive A Jeopardy Notice

Definition:

Percentage of total orders processed for which SWBT notifies the CLEC that the work will not be completed as committed on the original FOC.

Exclusions:

Excludes due date commitments that go into a jeopardy status due to CLEC or customer-caused delay (this exclusion does not apply to deferred LSR edit jeopardies, defined below, which are to be captured by this measure).

Business Rules:

Within each disaggregated category, SWBT will report the number of LSRs for which the due date confirmed on the FOC fell within the reporting period (month). Of those LSRs that came due within the month, SWBT will report the number and percentage for which it issued a jeopardy notifying the CLEC that the work would not be completed by the due date confirmed on the original FOC.

Method of Calculation:

(Number of Orders That Receive a Jeopardy Notice / Number of Orders With A Confirmed Due Date Falling Within the Reporting Month) x 100

Levels of Disaggregation

By interface, by order type (resale, UNE-P, DSL loops, other UNE), and by each of the following categories:

- Jeopardy notifications that result from CLEC LSR entry errors not detected by SWBT prior to issuance of FOC ("deferred LSR edit jeopardies")
- Jeopardy notifications that result from performance of facilities check after issuance of FOC ("facilities check jeopardies")
- All other jeopardy notifications ("provisioning jeopardies")

Report Structure:

Reported by electronic interface, for individual CLEC, all CLECs, SWBT (where parity analog applies) and SWBT Affiliates

Measurement Type:

Deferred LSR edit jeopardies – Tier 1 Medium/Tier 2 High
Facilities check jeopardies – diagnostic
Provisioning jeopardies – Tier 1 High/Tier 2 High

Benchmark:
Deferred LSR edit jeopardies: < 1%
Facilities check jeopardies: parity with SWBT retail and SWBT affiliates
Provisioning jeopardies: parity with SWBT retail and SWBT affiliates

NEW PM CLEC Proposals 11.2

ATT

11.2   Average Jeopardy Notice Interval

Definition:

For CLEC orders that are subject to a jeopardy notice, the average length of time between SWBT's issuance of the jeopardy notice and the due date and time that had been committed to the CLEC on the FOC.

Exclusions:

Excludes commitments jeopardized by CLEC or customer-caused delay.

Business Rule:

> Measures the remaining time between the pre-existing committed order completion date and time (communicated via the FOC) and the date and time SWBT issues a notice to the CLEC indicating that an order is in jeopardy of missing the due date (or that the due date/time has been missed). This measure is based on the total number of jeopardies issued during the reporting month.

Levels of Disaggregation

By interface, by order type (resale, UNE-P, DSL loops, other UNE), and by each of the following categories:

- Jeopardy notifications that result from CLEC LSR entry errors not detected by SWBT prior to issuance of FOC ("deferred LSR edit jeopardies")
- Jeopardy notifications that result from performance of facilities check after issuance of FOC ("facilities check jeopardies")
- All other jeopardy notifications ("provisioning jeopardies")

Calculation:

Sum ((Committed Due Date/Time for the Order) - (Date/Time of Jeopardy Notice)) / (Number of Order Jeopardized)

Report Structure:

Reported by electronic interface, for individual CLEC, all CLECs, SWBT (where parity analog applies) and SWBT Affiliates

Measurement Type: Diagnostic

Benchmark: TBD

MCI

MCIW concurs with AT&T's suggested changes

ATTACHMENT 7

Letter #	SWBT Description of Letter	Function	Exception (yes/no)	SWBT cited Regulatory Rqmt	Date Issued	Effective or Release Date	Calendar Days between Letter & Effective Date	Related AL	Comment
CLECSS00-058	"Updated Final Requirements Exception Request for May 27, 2000 Release"	Line Sharing, address validation and process improvements	Yes	No	4/6/2000	5/27/2000	51	CLECSS00-008	
CLECSS00-057	"Initial Requirements Exception Accessible Letter for the EDI/LSR July 22, 2000 Release"	capability to version releases, additional flow-through capabilities, enhancements to the Due Date process, Number Pooling, additional edits and LSOR improvements	Yes	No	4/6/2000	7/22/2000	107	None	
CLECSS00-060	"Clarification to Final Requirements Exception Request for EDI/CORBA Local Pre-Ordering Release 2.2"	"This Accessible Letter provides additional clarification to the final requirements for the Electronic Data Interchange (EDI)/Common Object Request Broker/Architecture (CORBA) Local Pre-Ordering release version 2.2, scheduled for implementation on April 29, 2000"	Yes	Yes - In earlier letters	4/17/2000	4/29/2000	12	CLECSS00-036 & 046	"This letter is based upon the discussions held during the xDSL Plan of Record (POR) Collaborative session March 28 and 29, 2000."
CLECSS00-061	"April 7th Walk-Through Updates to the Final Requirements for the May 27, 2000 Release"	"This Accessible Letter provides clarification to the Final Requirements "	Yes	Line Sharing	4/17/2000	5/27/2000	40	CLECSS00-049	"This letter supercedes all previous letters and combines the additional flow-through requirements, CLEC Handbook updates, LSOR and Job Aids for Line Sharing. (CLECSS00-53 dated April 3, 2000 and CLECSS00-056 dated April 5, 2000). In addition, the End User's address on conversion (Activity "V") has also been incorporated into this letter. (CLECSS00-051 dated March 29, 2000) "

Letter #	SWBT Description of Letter	Function	Exception (yes/no)	SWBT cited Regulatory Rqmt	Date Issued	Effective or Release Date	Calendar Days between Letter & Effective Date	Related AL	Comment
CLECSS00-064	"Updated Initial Requirements Exception Request for DataGate July 22nd, 2000 Local Pre-Ordering Release Version 11.0.x"		Yes	Not explicitly Refers to xDSL POR filed with FCC	4/19/2000	7/22/2000			"Updates to the Initial Requirements were due to changes resulting from SBC's Enhanced xDSL OSS Plan of Record filed with the FCC April 3, 2000. This proposed release is categorized as an Exception per the Change Management Process. "
CLECSS00-069	"Verigate Emergency Release 6.6.1"	emergency release for Verigate with Version 6.6.1			5/8/2000	5/7/2000			"This release corrects requests for Customer Service Record (CSR) summaries after requesting a CSR that fails with the message "Account out of SWBT". In addition, added field data information in the F1-F9 Plant Type Information Section of the Detail Loop Qualification Report has been corrected. "
CLECSS00-070	"Initial Requirements Exception Request for July 22nd EDI/CORBA Local Pre-Ordering Release 2.3.0"	"Initial Requirements"	Yes	Not explicitly Refers to xDSL POR filed with FCC	5/9/2000	7/22/2000		CLECSS00-007	"These Initial Requirements were not released according to the Category 1 timeline in order to incorporate the remaining enhancements resulting from SBC's Enhanced xDSL OSS Plan of Record filed with the FCC April 3, 2000" Includes loop qual, "other LSPOR enhancements" and "mandatory SSL3 for CSI" and "versioning support"
CLECSS0-071	"DataGate, Verigate and EDI/CORBA May 16, 2000 Special Release"	"special emergency DataGate, Verigate and EDI/CORBA release on May 16, 2000 at 12:01 a.m. CDT"			5/9/2000	5/16/2000			"correct the calculations received from the Loop Qualification database for determining the Qualification Status Field on the Detail Loop Qualification Report. The Qualification Status field displays the responses of Green, Yellow and Red. Upon subsequent investigation and internal testing of the April 29, 2000 release, Southwestern Bell has determined that in some instances the appropriate color was not returned when a loop qualification was performed"
CLECSS00-072	"Clarification to the Final Requirements for the May 27, 2000 EDI/LSR Ordering Release"	Clarification			5/11/2000	5/27/2000		CLECSS00-061	"clarification, based on CLEC input" - Related to Line Sharing loop qualification
CLECSS00-073	"EDI/LSR Ordering Exception Ordering Release Announcement for September 23, 2000"	"Release Announcement for EDI/LSR Ordering"	Yes	Refers to mandated line sharing	5/11/2000	9/23/2000			"Due to the work on the mandated release for Line Sharing many of the enhancements originally planned for the July release have been delayed. Southwestern Bell is proposing to deliver these enhancements in this September release. Includes flow-through & additional edits"

Letter #	SWBT Description of Letter	Function	Exception (yes/no)	SWBT cited Regulatory Rqmt	Date Issued	Effective or Release Date	Calendar Days between Letter & Effective Date	Related AL	Comment
CLECSS00-074	"Final Requirements Exception Accessible Letter for the EDI/LSR July 22, 2000 Release"	"Final Requirements for the planned LSR (Local Service Request) Release scheduled for July 22, 2000"	Yes	Not explicitly Refers to Line Sharing	5/15/2000	7/22/2000			"Work on the mandated release for Line Sharing delayed the release of these requirements and necessitated the need to seek an exception in order to meet the proposed implementation date. Includes LSR Versioning, Additional flow-through, & Number Pooling"
CLECSS00-076	"Verigate Emergency Release 6.6.2"	"emergency release for Verigate with Version 6.6.2 was applied on Sunday May 14, 2000 at 12:01 a.m. (CT)"		No	5/16/2000	5/14/2000			"Prior to the implementation of this emergency release, addresses in Nevada were not displayed on the screen, though physically retained in the database, during the Manual Loop Qualification request process"
CLECSS00-077	"SOUTHWESTERN BELL – Clarification to the DataGate, Verigate and EDI/CORBA May 16, 2000 Special Release"	"This letter is to clarify Accessible Letter CLECSS00-071 dated May 9, 2000 advising of a special emergency DataGate, Verigate and EDI/CORBA release on May 16, 2000"			5/16/2000	5/16/2000		CLECSS00-071	"With the implementation of the May 16, 2000 release, responses will correctly reflect the color associated with the existing 26 Gauge Equivalent Loop Length. This update will not require a download. "

ATTACHMENT 8

AT&T ISSUES CONCERNING SWBT TEST ENVIRONMENT

The following concerns are based on the views of AT&T and its EDI gateway vendor, GEIS, which assists in the conducting of joint carrier testing in advance of EDI release implementation. AT&T's most recent experience using the SWBT test environment was in connection with the May 27, 2000 EDI Release, which concluded the week of May 8, 2000.

1. SWBT's test environment does not adequately mirror production environment, thus limiting the ability to predict through pre-release testing the impact on live commercial order activity once a release is implemented.

2. SWBT does not maintain a standing set of test accounts against which testing activity can be conducted. Accounts that were available in a previous testing exercise are not assured of continued availability or stability (e.g. change in status can impact completion of planned order activity), thus interfering with the ability to perform regression testing. In addition, SWBT documentation does not suggest that SWBT adheres to a "test deck" quality assurance approach whereby a standard set of test cases are executed in the test environment in advance of the joint carrier testing.

3. Test environment has no "refresh" capability to permit any form of provisioning/ database updating that could then be reversed at the conclusion of testing.

4. CLECs are required to request test accounts and provide in advance the scenarios that are planned to be covered in testing. SWBT documentation provides that the CLEC is responsible 14 days prior to release testing to "specify release test cases and provide a complete data package containing account information and functionality to be release tested." *Pacific Bell, Nevada Bell, Southwestern Bell and CLEC Joint Release Test Plan Template*, p. 5 (Task 4).

5. SWBT has acknowledged that the test environment does not permit taking the order all the way through to posting. (Attachments A and B; *see also* Accessible Letter No. CLEC00-43, Minutes for 2/8/00 Change Management Meeting.). As was demonstrated through SWBT's testing and implementation of the January 2000 release, its inability to follow the order through to posting in the test environment resulted in a failure to detect problems that then negatively impacted processing of production orders following release implementation. Accessible Letter No. CLEC00-43, Minutes for 2/8/00 Change Management Meeting. Further, the impact of a new release on SWBT database updating cannot be adequately evaluated in the test environment.

6. Test environment does not permit analysis of what will occur on orders that are "in the pipeline" when release implementation occurs. Accessible Letter No. CLEC00-43, Minutes for 2/8/00 Change Management Meeting.

7.	Thorough testing cannot be accomplished until SWBT implements the release in the production environment. (Attachment A). This presents unreasonable risks, particularly for CLECs in live production. Despite this limitation in the test environment, SWBT does not support post-implementation testing in the production environment. AT&T's specific request for test accounts to be established in the production environment for limited post-implementation testing was refused. (Attachment B). SWBT has advised AT&T that it will not support any joint testing exercise other than in the test environment.

8.	SWBT has no effective procedure to ensure that steps taken to implement changes in the test environment in connection with a new release are duplicated in the production environment. For example, updating of tables in test environment was not replicated at time of SWBT's implementation of the January 2000 release, thus creating problems in production that were not seen in the test environment. Accessible Letter No. CLEC00-43, Minutes for 2/8/00 Change Management Meeting.

9.	SWBT's test environment does not offer true timing. CLECs cannot determine the impact of a new release on response intervals or flow through at SWBT's end because of manual steps built into the test environment, combined with increased possibility that orders will fall out to manual handling.

10.	The test environment relies heavily on manual file transfer and monitoring. For example, CLECs are required to contact SWBT to signal that test orders have been sent. SWBT then physically retrieves the file(s) which are then manually introduced into the EDI mapping processor which translates the data into a file format that LASR can read. Once translated, the file is once again manually transferred to the next stage – LASR. Based on calls conducted during testing, AT&T is aware that monitoring of test cases occurs within the LSC. Separate SWBT representatives responsible for observing/transferring the file at various stages (e.g. EDI, LASR, LSC) all participate on testing calls and report on the handling of the test case(s) in various stages of processing. Similarly, SWBT outbound transactions sent during testing do not replicate production processes. For example, SWBT's LASR representative ordinarily contacts AT&T and asks whether AT&T would like to receive a SOC on a particular test case. Even though the SOC is transmitted electronically, the process for generating and triggering the return of the SOC appears to be manually driven, operating independently of the due date. Thus, AT&T's experience with how SOC return is actually handled during testing is at odds with SWBT's documentation which states that "[o]nce the due date is realized, the order is automatically completed and receives a SOC. . . ." *Pacific Bell, Nevada Bell, Southwestern Bell and CLEC Joint Release Test Plan Template*, p. 18. [By way of contrast, the Bell Atlantic test environment automatically generates two completion notices: the service order completion and the posting completion notices.]

11. In the test environment, the possibility that a MOG-able order will be processed manually are increased, thus limiting the ability to test mechanization at SWBT's end. In the process of joint carrier testing conducting in early May 2000, SWBT advised AT&T that certain test cases had fallen out to manual processing – even though they should have mechanically generated internal service orders – because SWBT personnel were manually updating tables at the time the test cases were being transmitted. If LASR attempts to validate data on the LSR against tables that are in the process of being updated, the LSR falls out to manual handling. A CLEC sending test cases has no ability to determine that tables are "tied up" due to update activity. The explanation that SWBT has provided for excessive fall out during testing also raises serious concerns regarding the stability of the test environment. Mid-testing table updating, for example, introduces the risk that earlier results would not be duplicated if the same test case executions were repeated later in the testing timeline.

12. LSC representatives involved in testing are not adequately trained regarding new release requirements. For example, in the most recent limited testing of the May 27th release requirements, AT&T received a reject with an error notification code indicating a problem with the service address – even though documentation of the release represented that the service address need not be sent on a UNE-P conversion order and that any service address data included on the LSR would not be edited. (Erroneous rejects were received on other test cases as well.) The explanation provided was that the order had fallen out to manual handling and the LSC service representative had not been trained sufficiently concerning the change in requirements being introduced with the pending release. As a result, the representative mistakenly "screened" the order for service address errors, resulting in an inappropriate error notification. Unfortunately, this particular concern carries over into the production environment where LSC representatives' familiarity with methods and procedures concerning new release requirements is inconsistent.

13. A CLEC has no view of the processing of test cases at SWBT's end. Order Status, the toolbar application available to monitor status for production orders, is not available for test cases. Similarly, SWBT produces no BU340 file for test case, thus making it impossible to review SORD activity/record updating associated with the test cases.

14. SWBT does not perform adequate internal testing prior to commencing joint carrier testing. Despite discussion of testing issues at Change Management meetings, SWBT recently indicated that the press of other projects would not permit a near term revamping of its testing process. (Accessible Letter No. CLEC00-093, Minutes for 4/5/00 Change Management Meeting, p. 3) ("SBC indicated that it would review its internal testing process. SBC stated that it is not in a position with all the other projects committed for this year to totally revamp the test system at this time.").

Although SWBT represented that enhancements were to be introduced into the test environment last fall, AT&T has not observed improvements that are responsive to its stated areas of concern. Based on communications between AT&T and SWBT, it appears that the change SWBT effected last fall was the physical separation of its production and test environments. See Accessible Letter CLECSS99-150, dated 11/5/99. This change did not address issues raised by AT&T and other CLECs regarding the fact that SWBT's test environment does not adequately mirror its production environment.

SWBT represents that the flow of orders into and out of testing environments is "managed for purposes of facilitating validation steps and troubleshooting." *Pacific Bell, Nevada Bell, Southwestern Bell and CLEC Joint Release Test Plan Template*, p. 11 (8/18/99). This explanation understates the differences between SWBT's test and production environments and contradicts other statements that the testing environment is intended to "mirror the corresponding production environments." Id. Moreover, the stated justification for "breaks" in the processing is wholly inadequate to support the critical, functional differences between the two environments. The inadequacy of the current SWBT test environment severely limits the ability of pre-release testing to predict accurately how a release will impact live order activity.

Attachment A – SWBT (Bob Bannecker) E-mail to AT&T (Walt Willard), dated 5/9/00.
Attachment B – SWBT (Bob Bannecker) E-mail to AT&T (Julie Chambers), dated 4/24/00.

ATTACHMENT A

Original Message-----
From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
<mailto:[mailto:rb5422@txmail.sbc.com]>
Sent: Tuesday, May 09, 2000 1:11 PM
To: Willard, Walter W (Walt), NCAM
Cc: Chambers, Julie S, CMRGN; Deyoung, Sarah, NCAM; Hall, Lori L, CMRGN;
O'SULLIVAN, PAUL (PTSS)
Subject: RE: CLECSS00-051 - Address Validation

Walt:
I thought I responded to your e-mail but in checking I can't find that I did
so I apologize for that. Although these types of issues need to be worked
back through Change Management I have responded below to your questions.
Thanks,
Robert Bannecker

Account Manager - Industry Markets
Southwestern Bell Telephone Company
311 So. Akard, Rm. 630.08
Dallas, TX 75202
214-464-1053 - Office
214-858-0281 - Fax
888-961-8352 - Pager
rb5422@txmail.sbc.com <mailto:rb5422@txmail.sbc.com> - E-Mail

-----Original Message-----
From: Willard, Walter W (Walt), NCAM [mailto:wwillard@ems.att.com]
<mailto:[mailto:wwillard@ems.att.com]>
Sent: Wednesday, April 12, 2000 4:26 PM
To: BANNECKER, BOB G (SWBT)
Cc: Chambers, Julie S, NLSSS; Deyoung, Sarah, NCAM; Hall, Lori L, NLSSS;
O'SULLIVAN, PAUL (PTSS)
Subject: RE: CLECSS00-051 - Address Validation

Bob,
AT&T supports the concept of removing the service address requirement for
UNE conversion activity, but has some reservations based on the requirements
as published in SWBT's Accessible Letters CLECSS00-008,CLECSS00-040,
CLECSS00-051 and CLECSS00-058. First, AT&T is concerned that SWBT's
published requirements do not provide an option whereby a service address,
if submitted, would be checked against the submitted telephone number in
order to detect a potential customer mismatch. The method used by Pacific
Bell, whereby the service address that a CLEC submits is not used to process
the service request, but is partially validated against the TN, provides a
protection against unintentional slamming that is not provided in SWBT's
proposed requirements. Is SWBT willing to consider adding the Pacific Bell
partial validation process?
RESPONSE: Requests from CLECs have been not to require the address on
conversion orders.
SWBT has responded to those requests with the 5-27-00 release which no
longer requires the address to be populated on conversion orders. There

will be no validation on these types of orders.

SWBT will only validate the end user address on orders with a LNA of N. In order to validate, via the Pacific Bell validation process, population of the end user address would be required and that is not something the CLECs have said they want to do.

Second, we need to understand what process SWBT will follow when its downstream systems discover that the address retrieved internally from the CSR and the address as it exists in PREMIS do not match. How often does SWBT expect this will occur? What will be the impact on provisioning and billing? Will the CLEC be aware of the problem?

RESPONSE: There is no historical data on this but we anticipate these situations to be rare. If it does occur SWBT will reconcile the correct address with any database which may contain incorrect data. If this situation should occur the impact (if any) on provisioning and billing will be minor.

Third, we need to ensure that there is an adequate opportunity for testing of this release to determine whether it is functioning properly. In connection with the joint testing of this release, can SWBT take the test orders all the way through to posting?

RESPONSE: The test environment does not allow taking an order all the way through to posting. This issue has been discussed in Change Management. Short of that, as we have previously discussed, thorough testing cannot be accomplished until SWBT implements this release in the production environment. In addition, because of the lack of standard lead time between the announcement of the release and its introduction, AT&T will have to conduct simulation testing because it will not have yet done the internal development work necessary to implement the release end-to-end.

In light of our concern that the elimination of the service address requirement not be delayed any further, AT&T withdraws its objection to the change, but requests that the issues raised in this e-mail be addressed expeditiously.

Thanks,

ATTACHMENT B

Original Message-----
From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
Sent: Monday, April 24, 2000 3:36 PM
To: Chambers, Julie S, NLSSS
Subject: RE: production lines for testing

Julie,
SWBT has reviewed your request and after consideration has determined that
our Wholesale organization cannot support our involvement in setting up,
installing and administrating residential test lines into AT&T's office
complex for AT&T to do production testing. Any account set ups that SWBT
Wholesale would be involved in would have to be in our test environment.
Should AT&T feel the need to install lines for production testing they will
need to handle that directly with the SWBT Retail organization.
Please call should you have any questions.

Thanks,
Robert Bannecker

Account Manager - Industry Markets
Southwestern Bell Telephone Company
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Dallas, TX 75202
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214-858-0281 - Fax
888-961-8352 - Pager
rb5422@txmail.sbc.com - E-Mail

-----Original Message-----
From: Chambers, Julie S, NLSSS [mailto:jschambers@att.com]
Sent: Sunday, April 16, 2000 10:03 PM
To: BANNECKER, BOB G (SWBT)
Subject: RE: production lines for testing

Bob,
Because it's residential class of service along with the need to set up
along with "pseudo" database information -- we would require SWBT to set up
these accounts and assist in installing the lines. I would anticipate a
coordinated effort.
Julie

-----Original Message-----
From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
Sent: Friday, April 14, 2000 12:53 PM
To: Chambers, Julie S, NLSSS
Subject: RE: production lines for testing

Julie,
Just for clarification are you asking SWBT to set up these accounts have

these lines installed?

Thanks,
Robert Bannecker

Account Manager - Industry Markets
Southwestern Bell Telephone Company
311 So. Akard, Rm. 630.08
Dallas, TX 75202
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214-858-0281 - Fax
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rb5422@txmail.sbc.com - E-Mail

-----Original Message-----
From: Chambers, Julie S, NLSSS [mailto:jschambers@att.com]
Sent: Thursday, April 13, 2000 10:46 PM
To: BANNECKER, BOB G (SWBT)
Cc: Hall, Lori L, NLSSS; Irland, Jeffrey C (Jeff), NLSSS; Kettell, David
P, NLSSS
Subject: RE: production lines for testing

Bob,
I think we may be talking past each other...and the term "production
testing" might be the cause. I understand that SWBT's current testing
environment is not in the production system and therefore joint testing does
not test an end to end process. SWBT has stated that back-end testing is
performed prior to joint testing, but again, that is in SWBT's testing
environment.
Therefore, what we would like is the following:

Approximately 30+/- lines installed at a specific location (perhaps 5501 LBJ
freeway)-- and set up within SWBT's systems to mirror a residential SWBT
customer (pre-order information...which may have to be "modified" to support
a residential type address...customer name...etc) Set up in SWBT's normal
production systems. I would assume that other than the actual customer
specific data, these orders would appear as any other normal production LSR
received from AT&T.

AT&T will place "test" orders on our side (in that these lines are not true
end user customers) directly into SWBT's production system. I recognize
that this would be after the release date -- but, we often refer to this
testing as "smoke" orders in that it tests the system prior to
representatives on-line experiencing difficulties with customers actually on
the phone -- the morning after a release.

The benefits are that we are able to isolate potential issues on a much more
timely basis. Some of the "smoke" orders will occur after an AT&T internal
release and therefore, will not be testing SWBT's processes...but our own.
Additionally, there is significant value in running a few scenarios to test
new functionality (previously tested in Joint Testing) prior to the release,
to efficiently and expeditiously highlight any potential problems.

I hope this helps to clarify the request.
Perhaps a discussion with SWBT and AT&T SMEs would enable us to work out the details of making this happen.

Please let me know.

Thanks,
Julie

-----Original Message-----
From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
Sent: Thursday, April 13, 2000 2:34 PM
To: Chambers, Julie S, NLSSS
Cc: Hall, Lori L, NLSSS; Irland, Jeffrey C (Jeff), NLSSS
Subject: RE: production lines for testing

Julie,
There is currently no means to allow for "production testing" prior to the
actual release date and as such any "production testing" AT&T would do would
have to wait until after the release date. As you know this has been an
item of discussion during recent Change Management meetings.

As far as Account Team support in reference to any movement of POTS type
service used by AT&T for production testing purposes, from UNE-P to SWBT
retail we would be willing to offer some support in that area.

Thanks,
Robert Bannecker

Account Manager - Industry Markets
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214-858-0281 - Fax
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rb5422@txmail.sbc.com - E-Mail

-----Original Message-----
From: Chambers, Julie S, NLSSS [mailto:jschambers@att.com]
Sent: Friday, April 07, 2000 9:49 AM
To: BANNECKER, BOB G (SWBT)
Cc: Hall, Lori L, NLSSS; Irland, Jeffrey C (Jeff), NLSSS
Subject: production lines for testing

Bob,

AT&T is very interested in having the cability to perform a few tests in its
production platform with each internal release as well as SWBT release. As
was discussed in Change Management on Wednesay, given that the SWBT-CLEC
testing does not test and end to end process, we would be interested in

having the ability to perform a few tests in the live production environment
prior to opening up full production after a release. Additionally,
internally, we do our own testing, but again, would like the ability to
perform tests on production lines in order to quickly isolate any issues
potentially not captured during internal testing. This is in no way intended
to replace the test efforts which take place prior to the release. In fact,
I do not anticipate "coordinated" testing with these production lines. Once
available and installed, AT&T would manage the test efforts on the
production lines. Perhaps there could be some maintenance to work through
(e.g., if we needed the lines switched back to SWBT retail -- we would need
support from the account team to work through that process). And to the
extent we identified issues on SWBT's side, we would alert you as soon as
possible.
Thank you for your support in this request.

Julie Chambers

-----Original Message-----
From: BANNECKER, BOB G (SWBT) [mailto:rb5422@txmail.sbc.com]
Sent: Thursday, April 06, 2000 9:07 AM
To: Chambers, Julie S, NLSSS
Subject: 5-27 release testing.
Importance: High

Julie,
I need clarification on your request to install some 30 lines into the AT&T
building for production testing on the
5-27 release. Is AT&T still planning on testing prior to the release in the
test environment with test accounts? If so what is the intent on the 30
line request? I understood the 30 lines were going to be used to test in
production. Are you asking SWBT to test with AT&T both in the test
environment prior to the test and then test again with AT&T after the
release in the production environment? Please clarify what AT&T's
intentions are.

Thanks,
Robert Bannecker

Account Manager - Industry Markets
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rb5422@txmail.sbc.com - E-Mail